

JUN 26 2019

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUISUNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRADLEY A SEYER,

Defendant.

**4:19CR00476 RLW****INFORMATION**

The United States Attorney charges that:

**The Defendant**

1. At all times relevant to these charges, defendant Bradley A. Seyer was a resident of St. Louis County, Missouri. Defendant was a licensed dentist who maintained a dental office in St. Louis County, Missouri.

2. Defendant had a personal relationship with a female patient identified in this charge by her initials E.A. During this personal relationship, defendant provided E.A. with financial support, took her on vacation trips, and gave her gifts. While engaging in a personal relationship, defendant prescribed drugs to E.A. that contained controlled substances, including the opioid drugs Hydrocodone and Tramadol as well as the anti-anxiety drugs Xanax®. In an attempt to avoid questions or concerns over his prescribing practices, defendant sometimes provided drugs to E.A. by issuing her prescriptions that were written in the name of E.A.'s father, identified in this charge by his initials G.A. E.A. obtained controlled substance drugs under these prescriptions that defendant had written in her father's name, and she then consumed the drugs. Defendant's dental treatment file for E.A. does not document all the controlled substance prescriptions that defendant issued to her, either in her name or in her father's name.

**Health Care Benefit Program**

3. The Medicare program is a federally-funded health care benefits program within the meaning of 18 U.S.C. § 24(b) under which medical benefits, items, and services are provided to elderly individuals. Medicare does not pay for medically unnecessary drugs, or drugs that are prescribed for one patient but are actually consumed by another patient.

**COUNT ONE**

4. Paragraphs 1 through 3 are incorporated by reference, as if fully set forth herein.

5. On or about the date indicated below, in St. Louis County, Missouri, in the Eastern Division of the Eastern District of Missouri, and elsewhere,

**BRADLEY A. SEYER,**

the defendant herein, knowingly and willfully made and used materially false writings and documents, knowing the same to contain materially false, fictitious, and fraudulent statements and entries, in connection with the delivery of and payment for health care benefits, items, and services involving health care benefit programs as defined in 18 U.S.C. § 24(b), in violation of 18 U.S.C. § 1035, in that the defendant falsely stated and represented in a prescription that he was prescribing drugs to G.A, when the defendant then and there well knew said statements and representations were false, fictitious, and fraudulent, as the drugs were intended for and ultimately consumed by E.A.

COUNT	DATE OF OFFENSE	DRUG	PRESCRIBED FOR	HEALTH CARE BENEFIT PROGRAM
1	December 2, 2015	Tramadol	G.A.	Medicare

All in violation of Title 18, United States Code, Sections 1035(a)(2) and 2.

**COUNT TWO**

6. Paragraphs 1-3 are incorporated for reference, as if fully set forth herein.

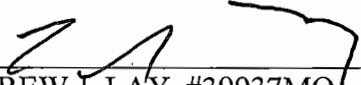
7. On or about February 19, 2018, in St. Louis County, within the Eastern Division of the Eastern District of Missouri and elsewhere, the defendant,

**BRADLEY A. SEYER**

did knowingly, intentionally, and unlawfully distribute and dispense Hydrocodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, to E.A, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney

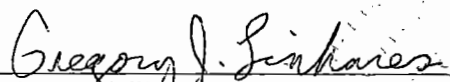
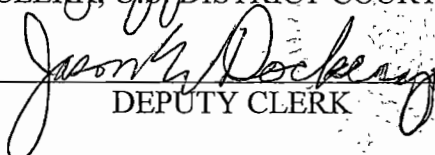
  
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ANDREW J. LAY, #39937MO  
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St. Louis, Missouri 63102  
(314) 539-2200

UNITED STATES OF AMERICA           )  
EASTERN DIVISION                    )  
EASTERN DISTRICT OF MISSOURI    )

I, Andrew J. Lay, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

  
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ANDREW J. LAY, #39937MO

Subscribed and sworn to before me this 14 day of June, 2017.

  
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CLERK, U.S. DISTRICT COURT  
By:   
\_\_\_\_\_  
DEPUTY CLERK